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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF STEVEN S.
SCHULTE IN SUPPORT OF
PLAINTIFFS' MOTION TO
RECONSIDER ORDER DISMISSING
CASES FOR FAILURE TO COMPLY
WITH PTO 10**

This Document Relates to:

*Jane Doe LR v. Uber Technologies, Inc., et
al., No. 3:24-cv-04306-CRB*

*Jane Doe JB v. Uber Technologies, Inc., et
al., No. 3:24-cv-04316-CRB*

*Jane Doe DC v. Uber Technologies, Inc., et
al., No. 3:24-cv-04373-CRB*

*Jane Doe (D.B.) v. Uber Technologies, Inc., et
al., No. 3:24-cv-04428-CRB*

*Jane Doe (AR) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05947-CRB*

*Jane Doe (AS) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05960-CRB*

*Jane Doe NLG (AB) v. Uber Technologies, Inc.,
et al., No. 3:24-cv-09188-CRB*

Judge: Honorable Charles R. Breyer

Jane Doe NLG (HK) v. Uber Technologies, Inc., et al., No. 3:25-cv-00675-CRB

Jane Doe NLG (CR) v. Uber Technologies, Inc., et al., No. 3:25-cv-01716

Jane Doe NLG (HW) v. Uber Technologies, Inc., et al., No. 3:25-cv-01725-CRB

Jane Doe NLG V.M. v. Uber Technologies, Inc., et al., No. 3:25-cv-02622-CRB

I, Steven S. Schulte, declare:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court in MDL No. 3084. I am a partner at the law firm of Nachawati Law Group and am counsel of record for the Plaintiffs subject to this dismissal without prejudice (pursuant to ECF No. 4442). I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
2. On November 12, 2025, Defendants filed a Reply to its Amended Motion to Dismiss for Failure to Comply with PTO 10 (“Reply”). ECF No. 4368. Before the date of Defendants’ Reply, the plaintiffs identified on Exhibit A to this declaration (“Plaintiffs”) had not yet provided or served plaintiff executed fact sheet verifications, and Defendants, therefore, designated them as non-compliant in the Reply.
3. Before the filing of the Reply, our firm made significant and extensive efforts to reach and reestablish contact with these above-captioned Plaintiffs, including but not limited to an extensive number of phone calls, emails, text messages, written communications and letters, and address and contact searches.

1 4. Before the Court's November 19, 2025 Order, our firm was able to obtain and serve in
2 MDL Centrality Plaintiffs' executed fact sheet verifications.

3 5. Thus, Plaintiffs respectfully request that the Court reconsider dismissal of these
4 Plaintiffs, due to their compliance with PTO 10 prior to the entry of the Court's
5 November 19, 2025 Order, and amend the Order to remove or exclude these Plaintiffs.
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7 Executed on December 3, 2025.

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9 **NACHAWATI LAW GROUP**

10 /s/ Steven S. Schulte

11 Steven S. Schulte (TX SBN 24051306)

12 *Appearance Pro Hac Vice*

13 *Counsel for Plaintiffs*
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